DOCKET FILE COPY ORIGINAL

ORIGINAL

Before the

Federal Communications Commission

Washington, D.C.

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact Upon Existing	)	MM Docket No. ~~87-208~~ 87-268
Television Broadcast Service	)	

To: *The Commission*

PETITION FOR RECONSIDERATION

Zavaletta Broadcasting of Sherman ("Zavaletta") hereby seeks reconsideration of the Federal Communications Commission's ("Commission") *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998) ("*MO&O*"), in the above-captioned proceeding.

I. Background

On September 20, 1996 Zavaletta filed an application for a new commercial broadcast television station to operate on Channel 20 at Sherman, Texas.[1]

---

[1] See Application of Zavaletta Broadcasting of Sherman for a New Commercial Broadcasting Television Station in Sherman, Texas, BPCT- 960920YP

(continued...)

In its *Sixth Report and Order* in this proceeding, 12 FCC Rcd 14588 (1997), the Commission noted that, in its *Sixth Further Notice of Proposed Rulemaking*, it stated that it would not accept additional applications for new NTSC stations that were filed after September 20, 1996.[2] The Commission also indicated, however, that it would continue to process applications already on file and those that were filed on or before September 20, 1996, because the Commission did not believe that these applications would have a "significant negative impact" on the development of the DTV Table of Allotments. *Sixth Report and Order*, 12 FCC Rcd at 14635, ¶104. Additionally, the Commission expressly stated that it would "maintain and protect" vacant allotments that are the subject of pending applications, and that such action would ensure that parties who have invested in new stations might continue pursuing their station projects. *See id.* at 14639, ¶ 112. Zavaletta's applica-

---

1 (...continued)
(filed September 20, 1996). Zavaletta's application included a request for waiver of the Commission's order in *Advance Television Systems and Their Impact on the Existing Television Broadcast Service*, RM-5811, 1987 FCC LEXIS 3477 (July 17, 1987), 52 Fed. Reg. 28346 (1987) ("Freeze Order").

2 *See Sixth Report and Order*, 12 FCC Rcd at 14636, ¶ 104; *Sixth Further Notice of Proposed Rulemaking*, 11 FCC Rcd 10968, 10992 ¶60 (1996) ("*Sixth Further Notice*"). Specifically, the Commission stated that it would not accept additional applications for NTSC stations that were filed after 30 days from the publication of the *Sixth Further Notice* in the Federal Register. A summary of the *Sixth Further Notice* was published in the Federal Register on August 21, 1996. *See* 61 Fed. Reg. 43209 (1996).

tion was filed by the September 20, 1996 cutoff date and therefore Zavaletta's application was entitled to protection pursuant to the *Sixth Report and Order*.

II. The MO&O Failed to Protect Zavaletta's Pending Application.

In its recent *MO&O*, the Commission repeatedly confirmed that it fully intended to protect pending NTSC applications filed by the September 20, 1996 deadline. *See, e.g., MO&O* at ¶¶ 571, 575, 608, 627. Nevertheless, the DTV Table set forth in the *MO&O* fails to protect Zavaletta's pending application for a new commercial broadcast television station on Channel 20 at Sherman, Texas. As stated above, Zavaletta's application for the Channel 20 facility at Sherman was on file with the Commission by the September 20, 1996 filing deadline. In its *Sixth Further Notice*, the Commission noted that there were more than 300 applications then on file which, if processed, would result in more than 100 new NTSC stations. *Sixth Further Notice*, 11 FCC Rcd at 10992, ¶60. The Commission further stated:

> As we process the applications on file now and those that are filed before the end of this filing opportunity, we will continue our current policy of considering requests for wavier of our 1987 Freeze Order on a case-by-case basis.

Id. (emphasis added).[3] The Commission failed to provide any notice that an application would be considered to be "pending" only if it had been formally "accepted for filing," or if the application did not include a request for waiver of the 1987 Freeze Order.[4] Indeed, in the *MO&O*, rather than "considering requests for waiver of the 1987 freeze Order on a case-by-case basis" as the Commission stated it would in its *Sixth Further Notice*,[5] the Commission simply disregarded all applications that contained a request for waiver of the 1987 Freeze Order in establishing the DTV Table, and treated such applications as if they never had been filed.[6]

The Commission's failure to protect Zavaletta's pending application for the new station on Channel 20 at Sherman, Texas is flatly inconsistent with the

---

3 The Commission reiterated this statement in its *Sixth Report and Order* at ¶104.

4 On the contrary, the Commission's clear proposal was not to accept any additional applications for new NTSC stations that were filed after the September 20, 1996 filing deadline. *See Sixth Report and Order*, 12 FCC Rcd at 14635, ¶ 104 (citing *Sixth Further Notice*, 11 FCC Rcd at 10992, ¶ 60).

5 *Sixth Further Notice*, 11 FCC Rcd at 10992, ¶ 60.

6 The Commission repeatedly states throughout the *MO&O* that applications containing such waivers had not been accepted, no action had been taken on the waiver request, and that the subject channel was used for DTV purposes. *See, e.g., MO&O* at ¶¶ 608 and 627; *see also id.* at ¶ 575 (indicating that certain pending applications were not protected because they were filed for stations in areas where the Commission did not allow the filing of new applications).

statements the Commission made in its *Sixth Further Notice and Sixth Report and Order,* and the Commission neglected to provide any explanation for its failure to consider Zavaletta's pending application in establishing the DTV Table. Therefore, for this reason alone, the DTV Table contained in the *MO&O* should be revised to accommodate Zavaletta's pending application for a new commercial broadcast television on Channel 20 at Sherman, Texas.

III. The Commission Should Substitute DTV Channel 38 for the Existing DTV Channel 20 Allotment at Sherman, Texas or, Alternatively, Zavaletta Should be Permitted to Amend its Pending NTSC Application to Specify Channel 50 as an Available Alternative Channel.

In this case, the previous NTSC allotment of Channel 20 at Sherman, Texas that was the subject of Zavaletta's application is short-spaced to a co-channel DTV allotment for Station KXII in Sherman, 54.5 km from the transmitter site proposed in Zavaletta's application. Even if the Commission should determine that its failure to consider Zavaletta's pending application for a Channel 20 NTSC facility at Sherman does not constitute a sufficient basis, in itself, for granting reconsideration of the DTV allotment of Channel 20 at Sherman, the Commission has stated throughout this proceeding that it intends to give broadcasters the flexibility to develop alternative allotment plans where they do not result in additional interference to other stations and/or allotments. In order to accommodate Zavaletta's pending application, Zavaletta respectfully requests that the Commission change the DTV

allotment for Station KXII from Channel 20 to Channel 38. As demonstrated in the attached engineering statement, the substitution of DTV Channel 38 for Channel 20 will result in only negligible interference to any other station and will provide 99.8% of Station KXII's existing service area.

Alternatively, in the event the Commission elects not to substitute DTV Channel 38 for Channel 20 at Sherman, Zavaletta requests that it be permitted to amend its pending application to specify operation on Channel 50. As demonstrated in the attached engineering statement, NTSC channel 50 will cause only negligible interference to any other DTV or NTSC facility. The proposed substitution of DTV Channel 38 for Channel 20 at Sherman or, alternatively, permitting Zavaletta to amend its pending NTSC application to specify operation on Channel 50 at Sherman, would effectuate the Commission's pronouncements in its *Sixth Further Notice and Sixth Report and Order* that it would protect those pending NTSC applications that were filed on or before September 20, 1996.

IV. The Proposals Set Forth Herein Would Provide Substantial Public Interest Benefits.

The substitution of DTV Channel 38 for Channel 20 at Sherman or permitting Zavaletta to amend its pending application to specify an available alternative NTSC channel at Sherman would serve the public interest by promoting the emergence and development of new networks. The Commission has long

espoused the goal of removing barriers that would inhibit the development of new networks.[7]

The successful emergence of new networks, however, depends in large part upon their ability to attract and retain local affiliates, which is the life blood of any national network. Moreover, for emerging networks, it is critical that they be afforded the opportunity to compete for affiliates as quickly as possible. Indeed, the large financial losses that confront any national network in its initial years of operation can be stemmed only by obtaining additional affiliates to carry the emerging network's programming. In many markets, however, there simply are not enough stations to provide affiliates for emerging networks in addition to those of the more established networks. Thus, the Commission should make the requested change in the DTV Table which, by permitting an additional broadcast station to serve the Sherman, Texas television market, will help promote emerging networks.

WHEREFORE, in light of the foregoing, Zavaletta Broadcasting Company respectfully requests that the Commission GRANT reconsideration of its *MO&O* by substituting DTV Channel 38 for the existing DTV Channel 20 allotment

---

[7] *See Amendment of Part 73 of the Commission's Rules and Regulations with Respect to Competition and Responsibility in Network Television Broadcasting*, 25 FCC 2d 318, 333 (1970); *Fox Broadcasting Co. Request for Temporary Waiver of Certain Provisions of 38 C.F.R. §73.658*, 5 FCC Rcd 3211, 3211 (1990), waiver extended, 6 FCC Rcd 2022 (1991).

at Sherman, Texas or, alternatively, permit Zavaletta Broadcasting Company to amend its pending NTSC application to specify operation on NTSC Channel 50.

Respectfully submitted,
Zavaletta Broadcasting of Sherman

By: _____
Joseph A. Zavaletta, Sr., M.D.
Managing General Partner

Date: April 20, 1997

Engineering Statement
Sherman, TX Channel 20
Wes, Inc. Broadcast Consultants

The program used to demonstrate interference and service replication percentages in this study was the OET FLR program, OET Bulletin 69, running on our own Sun Microsystems computers. These computers have been verified to give identical results to the runs generated by OET. The spacing programs are our own proprietary programs utilizing the FCC broadcast database and DTV database.

Due to a digital channel 20 being assigned to Sherman, TX, 54.5 km away, a study was conducted to propose moving the digital channel 20 to channel 38. The study showed that it would receive a 99.8% match rather than 100% and would cause negligible interference to digital 38 in Tulsa, OK, (-0.1% but a large increase over their present NTSC population covered). Tyler, TX, DTV 38 would also receive minimal interference (less than 0.5% loss but a large percent increase in population over their current NTSC coverage). No interference would be caused to any NTSC stations.

Should the Commission prefer moving the proposed NTSC channel 20 in Sherman, TX, the TV channel spacing study shows channel 50 open to such a change. The OET FLR studies showing the effects of moving the NTSC from 20 to 30 demonstrate no change in percent replication, with negligible (<0.05% change) in populations covered.

4/17/98

Pete E Myrl Warren, III Date
Whose qualifications are a matter of
record with the Commission

Sherman, TX, Digital Channel 20 moved to DTV Channel 38

Run begins Sat Apr 18 11:30:13 1998, host gilwell
Analysis of: 12N TX SHERMAN

	POPULATION	AREA (sq km)
within Noise Limited Contour	761668	39403.0
not affected by terrain losses	743107	37492.4
lost to NTSC IX	359385	7746.8
lost to additional IX by ATV	0	0.0
lost to all IX	359385	7746.8

Analysis of: 38A TX SHERMAN
HAAT 543.0 m, ATV ERP 578.9 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	761668	39403.0
not affected by terrain losses	760529	39158.7
lost to NTSC IX	203	24.0
lost to additional IX by ATV	39779	2014.8
lost to ATV IX only	39946	2030.8
lost to all IX	39982	2038.8
percent match ATV/NTSC	99.8	99.6

Analysis of: 23N TX GARLAND

	POPULATION	AREA (sq km)
within Noise Limited Contour	3163509	12973.1
not affected by terrain losses	3159286	12965.1
lost to NTSC IX	111867	376.4
lost to additional IX by ATV	13438	224.2
lost to all IX	125305	600.6

Analysis of: 24A TX GARLAND
HAAT 348.0 m, ATV ERP 172.9 kW, direction 0.0 degrees T, F/B = 18.8 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3163509	12973.1
not affected by terrain losses	3163469	12969.1
lost to NTSC IX	4186	12.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	4186	12.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 11N OK TULSA

	POPULATION	AREA (sq km)
within Noise Limited Contour	1157764	41015.0
not affected by terrain losses	1128250	38108.3
lost to NTSC IX	48268	3039.0
lost to additional IX by ATV	0	0.0
lost to all IX	48268	3039.0

Analysis of: 38A OK TULSA
HAAT 521.0 m, ATV ERP 838.3 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1157764	41015.0
not affected by terrain losses	1150541	40213.2
lost to NTSC IX	3563	64.1
lost to additional IX by ATV	11598	1082.5
lost to ATV IX only	15115	1126.6
lost to all IX	15161	1146.7
percent match ATV/NTSC	99.6	99.1

Analysis of: 7N TX TYLER

	POPULATION	AREA (sq km)
within Noise Limited Contour	705245	28661.4
not affected by terrain losses	686269	26851.5
lost to NTSC IX	67740	3471.1
lost to additional IX by ATV	0	0.0

lost to all IX	67740	3471.1

Analysis of: 38A TX TYLER
HAAT 302.0 m, ATV ERP 1000.0 kW, Cap Adj 0.0 dB 225.0 deg T, F/B = 1.1 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	705245	28661.4
not affected by terrain losses	703563	28367.8
lost to NTSC IX	49	32.2
lost to additional IX by ATV	8923	973.3
lost to ATV IX only	8972	997.5
lost to all IX	8972	1005.5
percent match ATV/NTSC	99.5	98.8

Finished Sat Apr 18 12:17:51; run time 0:43:46
152231 calls to Longley-Rice; path distance increment 1.00 km

Study with Sherman, TX, as it is presently on DTV 20

Run begins Sat Apr 18 10:41:52 1998, host gilwell
Analysis of: 12N TX SHERMAN

	POPULATION	AREA (sq km)
within Noise Limited Contour	761668	39403.0
not affected by terrain losses	743107	37492.4
lost to NTSC IX	359385	7746.8
lost to additional IX by ATV	0	0.0
lost to all IX	359385	7746.8

Analysis of: 20A TX SHERMAN
HAAT 543.0 m, ATV ERP 394.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	761668	39403.0
not affected by terrain losses	760893	39214.8
lost to NTSC IX	294	56.1
lost to additional IX by ATV	76105	460.6
lost to ATV IX only	76279	480.7
lost to all IX	76399	516.7
percent match ATV/NTSC	100.0	100.0

Analysis of: 23N TX GARLAND

	POPULATION	AREA (sq km)
within Noise Limited Contour	3163509	12973.1
not affected by terrain losses	3159286	12965.1
lost to NTSC IX	111867	376.4
lost to additional IX by ATV	13438	224.2
lost to all IX	125305	600.6

Analysis of: 24A TX GARLAND
HAAT 348.0 m, ATV ERP 172.9 kW, direction 0.0 degrees T, F/B = 18.8 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3163509	12973.1
not affected by terrain losses	3163469	12969.1
lost to NTSC IX	4186	12.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	4186	12.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 11N OK TULSA

	POPULATION	AREA (sq km)
within Noise Limited Contour	1157764	41015.0
not affected by terrain losses	1128250	38108.3
lost to NTSC IX	48268	3039.0
lost to additional IX by ATV	0	0.0
lost to all IX	48268	3039.0

Analysis of: 38A OK TULSA
HAAT 521.0 m, ATV ERP 838.3 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1157764	41015.0
not affected by terrain losses	1150541	40213.2
lost to NTSC IX	3563	64.1
lost to additional IX by ATV	6976	392.9
lost to ATV IX only	6986	396.9
lost to all IX	10539	457.1
percent match ATV/NTSC	99.7	99.5

Analysis of: 7N TX TYLER

	POPULATION	AREA (sq km)
within Noise Limited Contour	705245	28661.4
not affected by terrain losses	686269	26851.5
lost to NTSC IX	67740	3471.1
lost to additional IX by ATV	0	0.0

lost to all IX	67740	3471.1

Analysis of: 38A TX TYLER

HAAT 302.0 m, ATV ERP 1000.0 kW, Cap Adj 0.0 dB 225.0 deg T, F/B = 1.1 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	705245	28661.4
not affected by terrain losses	703563	28367.8
lost to NTSC IX	49	32.2
lost to additional IX by ATV	366	64.4
lost to ATV IX only	394	76.4
lost to all IX	415	96.5
percent match ATV/NTSC	100.0	100.0

Finished Sat Apr 18 11:27:08; run time 0:39:36

137773 calls to Longley-Rice; path distance increment 1.00 km

****** DTV to NTSC CHANNEL SPACING STUDY ******

Job title: Sherman, TX
DTV Channel: 38
Database file name: c:\tvsr\tv980408.edx

Latitude: 34 1 58
Longitude: 96 48 0

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
38o	ALLOTM	5630	TYLER	TX	2		142.7	232.8	244.6	-11.8
23o	KUVN	5893	GARLAND	TX	2	L	175.2	125.9	96.6	29.3

****** End of channel 38 study ******

Study Title: Sherman DTV 20 moved to DTV 38
Sherman, TX Channel 38

DTV Study Station, Transmitter Coordinates: 34-1-58 N 96-48-0 W

Study distance: 300 km

DTV TO DTV STUDY RESULTS

City of License	ST	Chan	Distance	Bearing	Req.Dist	Diff.
Oklahoma City	OK	39	179.94	339.23	88.50	91.44
Tulsa	OK	38	243.26	24.95	223.70	19.56
Tyler	TX	38	221.52	138.40	223.70	-2.18

Station is short-spaced to 1 station.

Sherman DTV 20's site

Computing Tools FCC Database Reports Rev 1.4
Digital TV Stations within 300.000 of 034-01-58 096-48-00
Accuracy and completeness of these results is NOT assured.

St	City	channel	latitude	longitude	distance, (km),	bearing (degrees)
TX	Dallas	9	32-35-06	096-58-41	161.422,	185.89608
TX	Dallas	14	32-34-43	096-57-12	161.908,	185.06004
OK	Bartlesville	15	36-30-59	095-46-10	291.055,	18.79319
OK	Oklahoma City	15	35-34-30	097-29-04	182.189,	339.89300
TX	Texarkana	15	32-54-12	094-00-23	288.324,	115.75112
TX	Wichita Falls	15	34-12-06	098-43-44	178.942,	276.00928
OK	Oklahoma City	16	35-33-45	097-29-24	181.065,	339.58966
AR	Fort Smith	18	35-30-43	094-21-38	277.117,	53.69174
OK	Enid	18	36-28-35	097-53-52	288.922,	339.77027
TX	Fort Worth	18	32-35-22	096-58-10	160.851,	185.62983
TX	Fort Worth	19	32-34-43	096-57-12	161.908,	185.06004
TX	Sherman	20	34-01-58	096-48-00	0.000,	0.00000
TX	Waco	20	31-30-31	097-10-03	282.032,	187.01275
AR	Fort Smith	21	35-04-16	094-40-46	226.163,	59.38374
OK	Tulsa	22	36-01-36	095-40-44	243.713,	24.82168
TX	Jacksonville	22	32-03-40	095-18-50	259.001,	147.59170
TX	Wichita Falls	22	33-54-04	098-32-21	161.400,	264.80851
OK	Lawton	23	34-12-55	098-43-13	178.303,	276.51898
OK	Oklahoma City	24	35-32-58	097-29-18	179.657,	339.47266
TX	Garland	24	32-54-04	096-41-14	125.950,	175.22528
OK	Ada	26	34-21-34	096-33-34	42.481,	31.46352
OK	Oklahoma City	27	35-34-07	097-29-20	181.665,	339.69498
OK	Okmulgee	28	35-50-02	096-07-28	209.125,	17.16611
TX	Wichita Falls	28	33-53-23	098-33-20	163.038,	264.41490
OK	Shawnee	29	35-16-50	097-20-14	146.917,	340.41511
TX	Decatur	30	32-52-16	096-55-22	129.344,	185.06327
OK	Eufaula	31	35-11-01	095-20-20	185.090,	46.39130
OK	Oklahoma City	32	35-32-58	097-29-50	179.944,	339.23007
TX	Dallas	32	32-35-22	096-58-10	160.851,	185.62983
OK	Oklahoma City	33	35-33-36	097-29-07	180.655,	339.68715
TX	Dallas	35	32-35-06	096-58-41	161.422,	185.89608
OK	Claremore	36	36-24-05	095-36-33	284.267,	22.42135
TX	Dallas	36	32-35-22	096-58-10	160.851,	185.62983
OK	Tulsa	38	36-01-15	095-40-32	243.255,	24.95148
TX	Tyler	38	32-32-21	095-13-16	221.522,	138.39883
OK	Oklahoma City	39	35-32-58	097-29-50	179.944,	339.23007
TX	Dallas	40	32-35-07	096-58-06	161.301,	185.57728
TX	Fort Worth	41	32-35-15	096-57-59	161.038,	185.52161
OK	Oklahoma City	42	35-35-22	097-29-03	183.684,	340.07390
OK	Tulsa	42	36-01-10	095-39-24	243.848,	25.33418
TX	Arlington	42	32-35-24	096-58-21	160.818,	185.73286
TX	Denton	43	32-35-22	096-58-10	160.851,	185.62983
TX	Dallas	45	32-35-22	096-58-10	160.851,	185.62983
TX	Greenville	46	33-09-32	096-08-34	114.525,	147.81352
OK	Tulsa	48	36-01-15	095-40-32	243.255,	24.95148
TX	Irving	48	32-35-24	096-58-21	160.818,	185.73286

OK Tulsa	49	36-02-34	095-57-11	235.998, 19.11524
OK Oklahoma City	50	35-34-24	097-29-08	182.050, 339.84276
TX Texarkana	50	33-25-29	094-02-34	264.288, 104.78449
OK Oklahoma City	51	35-22-54	097-29-20	162.400, 337.13131
TX Fort Worth	51	32-45-01	097-16-07	148.772, 197.04151
TX Longview	52	32-15-35	094-57-02	261.614, 138.73232
TX Lake Dallas	54	33-00-19	096-59-00	115.226, 188.50046
OK Tulsa	55	36-01-15	095-40-32	243.255, 24.95148
OK Tulsa	56	36-01-15	095-40-32	243.255, 24.95148
OK Tulsa	58	35-58-09	095-36-55	240.507, 26.72341

End of report.

Study not including Sherman, TX moved to NTSC Channel 50

Run begins Sat Apr 18 12:06:46 1998, host providence
Analysis of: 62N OK OKLAHOMA CITY

	POPULATION	AREA (sq km)
within Noise Limited Contour	896578	8325.7
not affected by terrain losses	896081	8257.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 50A OK OKLAHOMA CITY
HAAT 144.0 m, ATV ERP 50.0 kW, direction 315.0 degrees T, F/B = 0.5 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	896578	8325.7
not affected by terrain losses	896578	8325.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	98106	527.9
lost to ATV IX only	98106	527.9
lost to all IX	98106	527.9
percent match ATV/NTSC	89.1	93.7

Analysis of: 52N TX FORT WORTH

	POPULATION	AREA (sq km)
within Noise Limited Contour	3819012	14801.6
not affected by terrain losses	3804730	14440.8
lost to NTSC IX	2729	252.6
lost to additional IX by ATV	0	0.0
lost to all IX	2729	252.6

Analysis of: 51A TX FORT WORTH
HAAT 328.0 m, ATV ERP 172.9 kW, direction 50.0 degrees T, F/B = 18.9 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3819012	14801.6
not affected by terrain losses	3812432	14609.2
lost to NTSC IX	3783	112.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	1	4.0
lost to all IX	3783	112.3
percent match ATV/NTSC	100.0	99.9

Analysis of: 6N TX TEMPLE

	POPULATION	AREA (sq km)
within Noise Limited Contour	1438586	50487.8
not affected by terrain losses	1281978	47988.3
lost to NTSC IX	310813	12678.3
lost to additional IX by ATV	0	0.0
lost to all IX	310813	12678.3

Analysis of: 50A TX TEMPLE
HAAT 573.0 m, ATV ERP 1000.0 kW, Cap Adj 4.1 dB 358.0 deg T, F/B = 0.1 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	1438586	50487.8
not affected by terrain losses	1311467	48632.3
lost to NTSC IX	4000	152.9
lost to additional IX by ATV	217036	1098.8
lost to ATV IX only	217036	1102.8
lost to all IX	221036	1251.7
percent match ATV/NTSC	94.1	99.2

Finished Sat Apr 18 12:30:08; run time 0:22:35
89961 calls to Longley-Rice; path distance increment 1.00 km

Study with Sherman, TX, Channel 50 included

Run begins Sat Apr 18 12:47:18 1998, host providence
Analysis of: 50N TX SHERMAN

	POPULATION	AREA (sq km)
within Noise Limited Contour	3540546	31885.5
not affected by terrain losses	3520860	31619.7
lost to NTSC IX	2348133	3282.8
lost to additional IX by ATV	15109	660.6
lost to all IX	2363242	3943.4

Analysis of: 69A TX SHERMAN
HAAT 566.0 m, ATV ERP 273.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3540546	31885.5
not affected by terrain losses	3533032	31800.9
lost to NTSC IX	71587	100.7
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	71587	100.7
percent match ATV/NTSC	100.0	100.0

Analysis of: 62N OK OKLAHOMA CITY

	POPULATION	AREA (sq km)
within Noise Limited Contour	896578	8325.7
not affected by terrain losses	896081	8257.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 50A OK OKLAHOMA CITY
HAAT 144.0 m, ATV ERP 50.0 kW, direction 315.0 degrees T, F/B = 0.5 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	896578	8325.7
not affected by terrain losses	896578	8325.7
lost to NTSC IX	23	8.1
lost to additional IX by ATV	98092	523.9
lost to ATV IX only	98106	527.9
lost to all IX	98115	531.9
percent match ATV/NTSC	89.1	93.7

Analysis of: 52N TX FORT WORTH

	POPULATION	AREA (sq km)
within Noise Limited Contour	3819012	14801.6
not affected by terrain losses	3804730	14440.8
lost to NTSC IX	39616	886.0
lost to additional IX by ATV	0	0.0
lost to all IX	39616	886.0

Analysis of: 51A TX FORT WORTH
HAAT 328.0 m, ATV ERP 172.9 kW, direction 50.0 degrees T, F/B = 18.9 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3819012	14801.6
not affected by terrain losses	3812432	14609.2
lost to NTSC IX	7887	216.5
lost to additional IX by ATV	0	0.0
lost to ATV IX only	1	4.0
lost to all IX	7887	216.5
percent match ATV/NTSC	100.0	99.9

Analysis of: 6N TX TEMPLE

	POPULATION	AREA (sq km)
within Noise Limited Contour	1438586	50487.8
not affected by terrain losses	1281978	47988.3
lost to NTSC IX	310813	12678.3

lost to additional IX by ATV	0	0.0
lost to all IX	310813	12678.3

Analysis of: 50A TX TEMPLE

HAAT 573.0 m, ATV ERP 1000.0 kW, Cap Adj 4.1 dB 358.0 deg T, F/B = 0.1 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	1438586	50487.8
not affected by terrain losses	1311467	48632.3
lost to NTSC IX	34026	1392.6
lost to additional IX by ATV	216878	990.1
lost to ATV IX only	217036	1102.8
lost to all IX	250904	2382.7
percent match ATV/NTSC	94.1	99.2

Finished Sat Apr 18 13:21:59; run time 0:33:59

142321 calls to Longley-Rice; path distance increment 1.00 km

Study Title: Sherman, TX Channel 20 moved to Channel 50
Sherman, TX Channel 50

NTSC Study Station, Transmitter Coordinates: 33-33-36 N 96-57-35 W

Study distance: 300 km

NTSC TO DTV STUDY RESULTS

City of License	ST	Chan	Distance	Bearing	Req.Dist	Diff.
Oklahoma City	OK	42	230.21	347.93	96.60	133.61
Oklahoma City	OK	50	228.49	347.81	244.60	-16.11
Oklahoma City	OK	51	207.84	346.47	88.50	119.34
Tulsa	OK	42	297.76	23.61	96.60	201.16
Tulsa	OK	48	297.21	23.29	96.60	200.61
Tulsa	OK	49	290.42	18.49	88.50	201.92
Tulsa	OK	58	294.24	24.73	96.60	197.64
Arlington	TX	42	107.58	180.64	96.60	10.98
Belton	TX	47	292.25	192.47	96.60	195.65
Denton	TX	43	107.64	180.48	96.60	11.04
Fort Worth	TX	51	94.31	197.79	88.50	5.81
Greenville	TX	46	88.09	120.33	96.60	-8.51
Irving	TX	48	107.58	180.64	96.60	10.98
Lake Dallas	TX	54	61.56	182.05	96.60	-35.04
Longview	TX	52	236.90	127.50	96.60	140.30
Temple	TX	50	254.75	185.53	244.60	10.15
Texarkana	TX	50	271.49	93.17	244.60	26.89
Waco	TX	53	250.43	187.69	96.60	153.83
Waco	TX	57	251.40	187.90	96.60	154.80

Station is short-spaced to 3 stations.

****** TV CHANNEL SPACING STUDY ******

Job title: Sherman, TX
Channel: 50
Database file name: c:\tvsr\tv980408.edx

Latitude: 33 33 36
Longitude: 96 57 35

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
36+	ALLOTM	5641	PARIS	TX	2		84.7	130.8	95.7	35.1
49o	KHSXTV	5906	IRVING	TX	2	L	180.6	107.6	87.7	19.9
49o	KHSXTV	5907	IRVING	TX	2	A	180.2	108.2	87.7	20.5
55o	KLDT	5908	LAKE DALLAS	TX	2	C	177.4	76.5	31.4	45.1

****** End of channel 50 study ******

Sherman, TX

Computing Tools FCC Database Reports Rev 1.4
Digital TV Stations within 300.000 of 033-33-36 096-57-35
Accuracy and completeness of these results is NOT assured.

St	City	channel	latitude	longitude	distance, (km),	bearing (degrees)
TX	Dallas	9	32-35-06	096-58-41	108.143,	180.90705
TX	Dallas	14	32-34-43	096-57-12	108.840,	179.68593
OK	Oklahoma City	15	35-34-30	097-29-04	228.651,	347.84279
TX	Texarkana	15	32-54-12	094-00-23	284.752,	104.81856
TX	Wichita Falls	15	34-12-06	098-43-44	178.480,	293.50105
OK	Oklahoma City	16	35-33-45	097-29-24	227.405,	347.64273
LA	Shreveport	17	32-40-29	093-55-59	299.058,	109.16547
TX	Fort Worth	18	32-35-22	096-58-10	107.641,	180.48323
TX	Fort Worth	19	32-34-43	096-57-12	108.840,	179.68593
TX	Sherman	20	34-01-58	096-48-00	54.485,	15.75223
TX	Waco	20	31-30-31	097-10-03	228.320,	184.90426
AR	Fort Smith	21	35-04-16	094-40-46	268.605,	51.38825
OK	Tulsa	22	36-01-36	095-40-44	297.687,	23.18940
TX	Jacksonville	22	32-03-40	095-18-50	226.692,	137.16009
TX	Wichita Falls	22	33-54-04	098-32-21	151.189,	284.49189
OK	Lawton	23	34-12-55	098-43-13	178.348,	294.04957
TX	Killeen	23	31-18-52	097-19-37	251.395,	187.89589
OK	Oklahoma City	24	35-32-58	097-29-18	225.958,	347.60108
TX	Abilene	24	32-16-38	099-35-51	284.813,	240.03415
TX	Garland	24	32-54-04	096-41-14	77.363,	160.83288
LA	Shreveport	25	32-40-41	093-55-35	299.520,	109.05994
OK	Ada	26	34-21-34	096-33-34	96.082,	22.64778
TX	Waco	26	31-20-15	097-18-37	248.650,	187.61810
OK	Oklahoma City	27	35-34-07	097-29-20	228.045,	347.70465
LA	Shreveport	28	32-41-08	093-56-00	298.625,	108.95047
OK	Okmulgee	28	35-50-02	096-07-28	263.602,	16.87802
TX	Wichita Falls	28	33-53-23	098-33-20	152.362,	283.88811
OK	Shawnee	29	35-16-50	097-20-14	193.985,	349.69449
TX	Abilene	29	32-17-13	099-44-20	295.816,	241.49333
TX	Decatur	30	32-52-16	096-55-22	76.479,	177.41880
OK	Eufaula	31	35-11-01	095-20-20	233.802,	39.61812
OK	Oklahoma City	32	35-32-58	097-29-50	226.135,	347.39919
TX	Dallas	32	32-35-22	096-58-10	107.641,	180.48323
OK	Oklahoma City	33	35-33-36	097-29-07	227.041,	347.73441
LA	Shreveport	34	32-40-00	093-56-02	299.292,	109.33109
TX	Dallas	35	32-35-06	096-58-41	108.143,	180.90705
TX	Dallas	36	32-35-22	096-58-10	107.641,	180.48323
OK	Tulsa	38	36-01-15	095-40-32	297.215,	23.29332
TX	Tyler	38	32-32-21	095-13-16	197.960,	124.88257
OK	Oklahoma City	39	35-32-58	097-29-50	226.135,	347.39919
TX	Dallas	40	32-35-07	096-58-06	108.102,	180.42619
TX	Fort Worth	41	32-35-15	096-57-59	107.854,	180.33070
OK	Oklahoma City	42	35-35-22	097-29-03	230.212,	347.93400
OK	Tulsa	42	36-01-10	095-39-24	297.762,	23.61076
TX	Arlington	42	32-35-24	096-58-21	107.582,	180.63545
TX	Denton	43	32-35-22	096-58-10	107.641,	180.48323

LA	Shreveport	44	32-40-00 093-56-02	299.292, 109.33109
TX	Dallas	45	32-35-22 096-58-10	107.641, 180.48323
TX	Greenville	46	33-09-32 096-08-34	88.094, 120.33032
TX	Belton	47	30-59-12 097-37-47	292.250, 192.47363
OK	Tulsa	48	36-01-15 095-40-32	297.215, 23.29332
TX	Irving	48	32-35-24 096-58-21	107.582, 180.63545
OK	Tulsa	49	36-02-34 095-57-11	290.422, 18.49340
OK	Oklahoma City	50	35-34-24 097-29-08	228.492, 347.80791
TX	Temple	50	31-16-24 097-13-14	254.754, 185.52673
TX	Texarkana	50	33-25-29 094-02-34	271.495, 93.16796
OK	Oklahoma City	51	35-22-54 097-29-20	207.840, 346.47235
TX	Fort Worth	51	32-45-01 097-16-07	94.312, 197.79111
TX	Longview	52	32-15-35 094-57-02	236.900, 127.49519
TX	Waco	53	31-19-19 097-18-58	250.433, 187.69083
TX	Lake Dallas	54	33-00-19 096-59-00	61.561, 182.04755
OK	Tulsa	55	36-01-15 095-40-32	297.215, 23.29332
OK	Tulsa	56	36-01-15 095-40-32	297.215, 23.29332
TX	Waco	57	31-18-52 097-19-37	251.395, 187.89589
OK	Tulsa	58	35-58-09 095-36-55	294.238, 24.72846

End of report.